

**FILED****11/15/2021**THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

CASE NUMBER: 21CR696

v.

LINDSEY BELL

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

**Count One**

On or about November 12, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant violated:

*Code Section*Title 18, United States Code, Section  
2114(a)*Offense Description*

robbery of a person having lawful charge, control, or custody of any money or other property of the United States, and, in effecting such robbery, put that person's life in jeopardy by the use of a dangerous weapon, namely, a firearm

**Count Two**

On or about November 12, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant violated:

*Code Section*Title 18, United States Code, Section  
924(c)(1)(A)*Offense Description*

knowingly brandished a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, robbery of property of a person having control of money of the United States, in violation of Title 18, United States Code, Section 2114, as further set forth in Count One of this Complaint

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

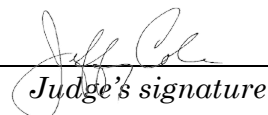
*Sean Ahern* 11/15/2021

Sean Ahern

Special Agent, Bureau of Alcohol, Tobacco,  
Firearms & Explosives (ATF)

Pursuant to Fed. R. Crim. P. 4.1, this complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: November 15, 2021 10:00am

  
Judge's signature

City and state: Chicago, Illinois

JEFFREY COLE, U.S. Magistrate Judge

*Printed name and title*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

**AFFIDAVIT**

I, SEAN AHERN, being duly sworn, state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”), and have been so employed since approximately 2018. As part of my duties as an ATF Special Agent, I investigate criminal violations of federal firearms and drug-trafficking offenses, including, but not limited to, Title 18, United States Code, Sections 922 and 924, and Title 21, United States Code, Sections 841 and 846.

2. This affidavit is submitted in support of a criminal complaint alleging that LINDSEY BELL has violated Title 18, United States Code, Section 2114, by robbing an individual who had lawful charge, control, or custody of money of the United States, of money or other property of the United States; and Title 18, United States Code, Section 924(c)(1)(A), by brandishing a firearm during and in relation to a crime of violence.

3. The facts set forth in this affidavit are based on my personal knowledge, my training and experience, my review of certain reports and video footage, information provided to me by various law enforcement personnel and witnesses, and the training and experience of other law enforcement officers with whom I have spoken.

4. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging BELL with robbery of an individual of money or property of the United States and with brandishing a firearm during that robbery, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offenses alleged in the complaint.

## **I. FACTS SUPPORTING PROBABLE CAUSE**

### **A. Background of Investigation**

5. Since in or around January 2021, law enforcement has been investigating members of the “Fly Life” faction of the Gangster Disciples street gang (the “Fly Life GD”), who are known to operate on the west side of Chicago, for alleged violations of federal firearm and drug trafficking laws. Specifically, law enforcement has been investigating Lindsey BELL, believed to be a Fly Life GD member, for unlawful possession of firearms by a felon, and unlawful distribution of controlled substances, among other offenses.

6. The investigation has involved the use of a confidential source (“CS-1”)<sup>1</sup>, who engaged in eight controlled purchases of 3,4-

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<sup>1</sup> CS-1 has been arrested on approximately eight occasions and has two criminal convictions for narcotics-related offenses. CS-1 has been cooperating with law enforcement since in or around 2006. To date, ATF has paid CS-1 approximately \$243,325 in exchange for his/her assistance in this investigation and other investigations. CS-1 has provided both ATF and the Chicago Police Department with information that has been proven reliable in the past and that has resulted in the recovery of narcotics, firearms, and ammunition. Information provided to law enforcement by CS-1 has been further corroborated by recorded conversations and controlled purchases of firearms and narcotics. Since cooperating with ATF, CS-1 has

Methylenedioxymethamphetamine (“ecstasy” or “MDMA”) from BELL from approximately February 2021 through approximately June 2021.

7. Specifically, between February 2021 and June 2021, CS-1, who was acting at the direction of law enforcement, purchased MDMA approximately eight times from BELL. Each time, CS-1 coordinated the transaction with BELL, who was using telephone number 773-xx-6076.<sup>2</sup> Each transaction was audio and video recorded by CS-1 and surveilled by law enforcement. In total, BELL sold CS-1 approximately 227 grams of MDMA in exchange for \$10,600 over eight transactions.

**B. BELL’s Armed Robbery of CS-1 On or About November 12, 2021**

8. On or about November 8, 2021, at approximately 2:50 p.m., BELL used a Facebook account with the username “Corey Bell” to communicate with CS-1 about selling a firearm to CS-1.<sup>3</sup> At approximately 3:00 p.m., BELL sent CS-1 a picture, via Facebook messenger, of the firearm that BELL wanted to sell. A screenshot of the

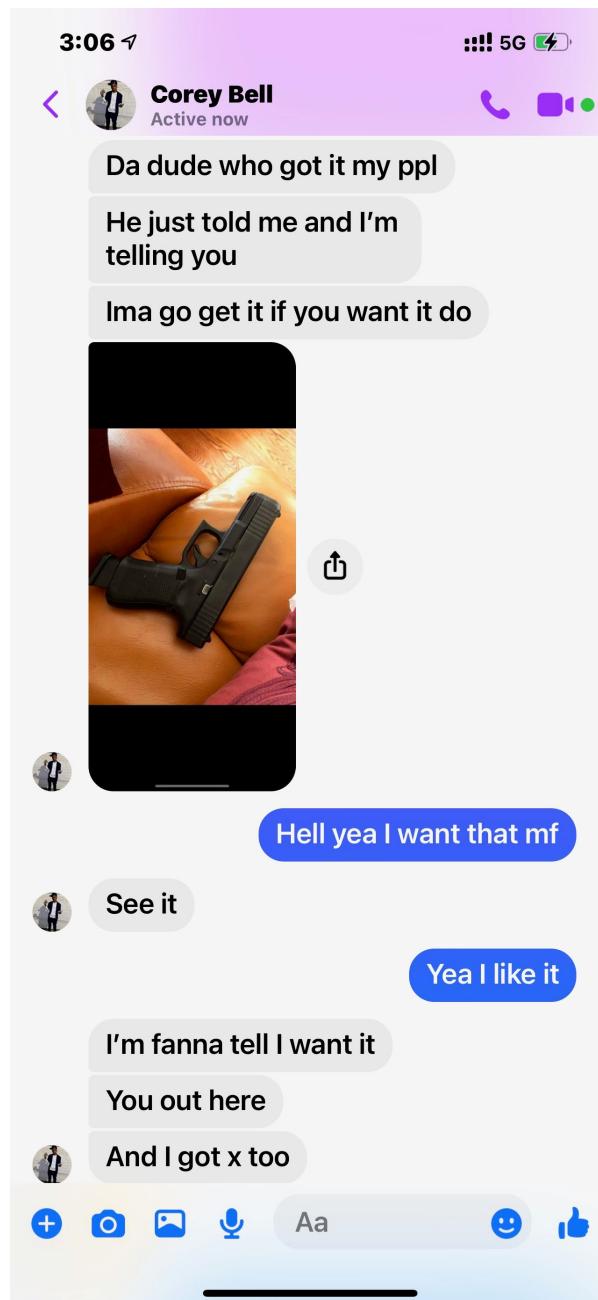
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been working exclusively as a paid informant and is not currently cooperating in exchange for potential sentencing credit or other consideration in a pending criminal case.

<sup>2</sup> Law enforcement identified BELL as the user of the telephone number ending in -6076 based on the following: as described in this affidavit, CS-1 set up several narcotics transactions with the user of the -6076 number. At those transactions, law enforcement observed BELL meet with CS-1 to conduct the transactions. In addition, law enforcement compared the video recordings of BELL to the audio recordings of the user of the -6076 number and determined that BELL is the user of the -6076 number.

<sup>3</sup> Law enforcement believes BELL is the user of this Facebook account for the following reasons: as described in this affidavit, CS-1 communicated with the user of the “Corey Bell” Facebook account and they agreed to meet up, so that CS-1 could purchase a pistol from the user of the “Corey Bell” account. CS-1 went to the planned meeting on November 12, 2021, and BELL was the individual who met up with CS-1 on November 12, 2021. Further, the last name of the user who communicated with CS-1 matches BELL’s last name, and the profile picture for the account appears to be BELL. CS-1 showed law enforcement the messages that he/she exchanged with BELL leading up to the planned firearm transaction, and law enforcement captured the messages.

Facebook messages exchanged between BELL and CS-1 are depicted below. The communications from BELL's account are in gray, and CS-1's messages are in blue.



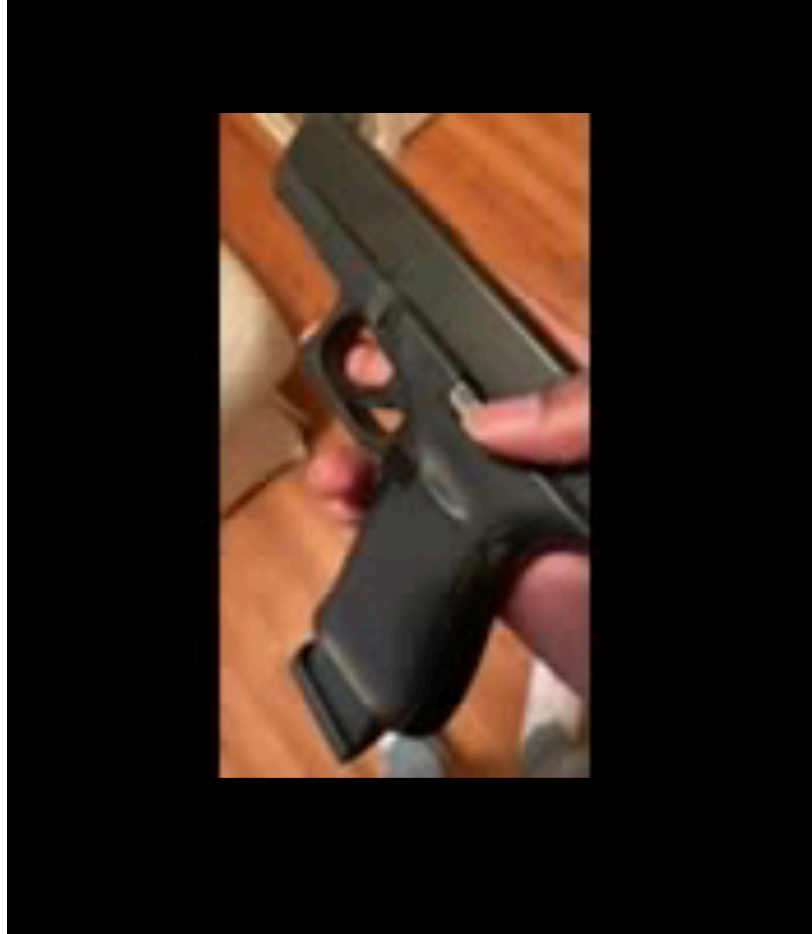
9. On or about November 10, 2021, at approximately 8:00 a.m., CS-1 texted BELL on telephone number 773-xxx-6076. In the message, CS-1 asked BELL to call

him/her. At approximately 9:40 a.m., BELL, using telephone number 773-xxx-3617,<sup>4</sup> called CS-1. The call was recorded. During the call, BELL agreed to sell CS-1 the pistol for \$1,000. BELL and CS-1 agreed to meet on or about November 12, 2021 to conduct the transaction. Also, during the call, CS-1 asked BELL to send CS-1 a video of the pistol as verification of BELL's possession of the pistol.

10. On or about November 11, 2021, at approximately 12:44 a.m., BELL, using telephone number 773-xxx-3617, sent a video of the firearm to CS-1. A screenshot from the video is below:

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<sup>4</sup> Law enforcement identified BELL as the user of the telephone number ending in -3617 based on the following: as described in this affidavit, the user of the -3617 number placed telephone calls to CS-1 for the purpose of setting up a firearm transaction with CS-1 to take place on or about November 12, 2021. On or about November 12, 2021, BELL met with CS-1. In addition, as set forth in footnote 2 above, law enforcement is familiar with BELL's voice based on law enforcement's review of prior audio and video recordings of BELL. Based on law enforcement's review of the recordings between CS-1 and the user of the -3617 number, law enforcement identified BELL as the person who used the -3617 number to place telephone calls to CS-1, as set forth in this affidavit.



11. On or about November 12, 2021, BELL, using telephone number 773-xxx-3617, had recorded calls with CS-1 confirming the planned firearm transaction. Specifically, during the calls, BELL and CS-1 agreed to meet later that day at approximately 1:00 p.m. near a gas station located at approximately Van Buren Street and South Ashland Avenue, in Chicago, Illinois, for the transaction.

12. At approximately 1:00 p.m., law enforcement agents met with CS-1 at a predetermined location and searched CS-1 and his/her vehicle for contraband, firearms, and excess U.S. currency, and found none. Law enforcement then equipped CS-1 and CS-1's vehicle with audio/video recording devices and provided CS-1 with approximately \$1,000 in pre-recorded government funds to purchase the pistol from



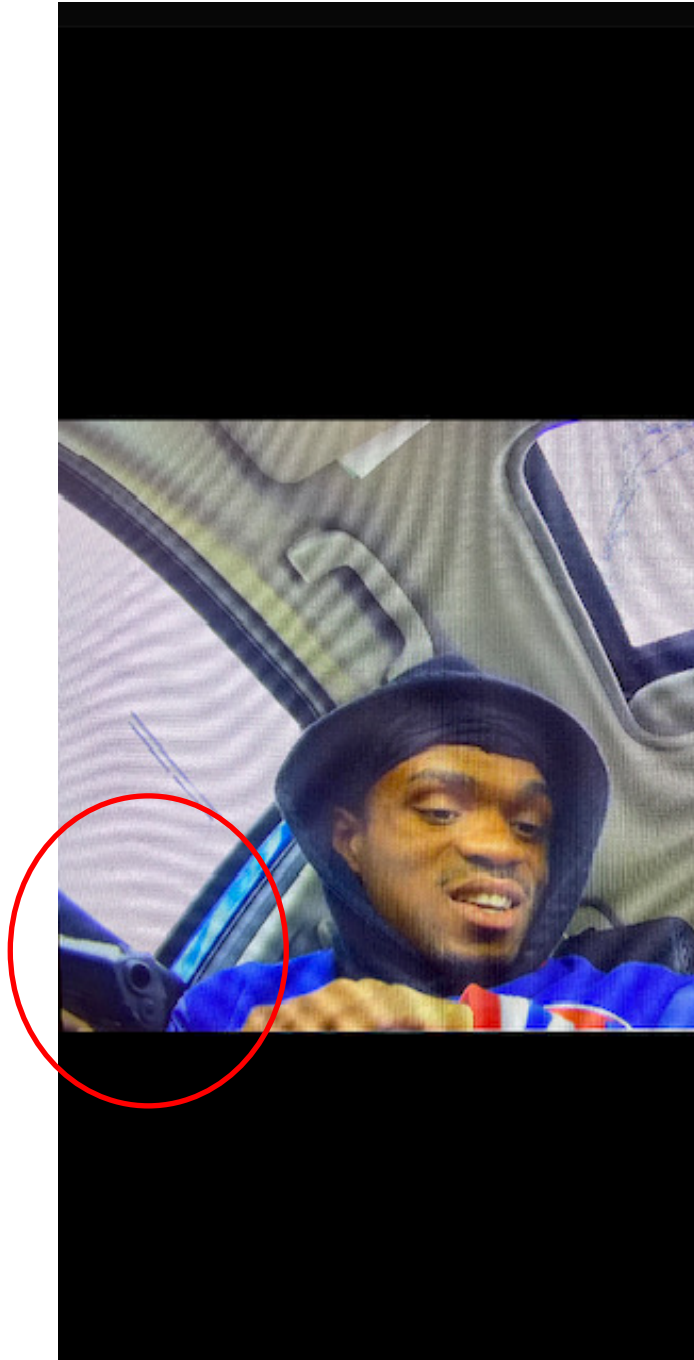
BELL. In addition to the audio/video recording devices, CS-1 was also equipped with a transmitter that provided agents with a live audio feed. CS-1 then drove to the area of the gas station while being followed by law enforcement.

13. At approximately 1:22 p.m., law enforcement surveillance observed a grey Nissan Sentra with Illinois temporary registration number 568-AA-391 drive past CS-1's vehicle, which was located near the gas station. According to CS-1, BELL occupied the front passenger seat of the vehicle. According to CS-1, BELL alerted CS-1 to turn onto South Paulina Street. Law enforcement surveillance observed CS-1's vehicle travel down Paulina Street. Law enforcement surveillance observed CS-1 park his/her vehicle on the street, behind the Nissan Sentra. Law enforcement then observed BELL<sup>5</sup> exit the front passenger side of the Nissan Sentra, and enter the front passenger seat of CS-1's vehicle. The driver of Nissan Sentra remained in the driver's seat of the vehicle.

14. At approximately 1:30 p.m., law enforcement, listening to CS-1's live audio transmitter, heard BELL repeatedly demand that CS-1 give BELL his/her wallet. According to CS-1 and the audio/video recording captured by the device in CS-1's vehicle, which were later reviewed by law enforcement, while BELL was ordering CS-1 to turn over his/her wallet, BELL was also pointing a firearm at CS-1. A screenshot from the audio/video recording device in CS-1's vehicle showing BELL pointing the gun at CS-1 is shown below:

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<sup>5</sup> Law enforcement identified BELL by comparing the individual who met with CS-1 to BELL's booking photo. Law enforcement also was familiar with BELL's appearance based on previous narcotics transactions that BELL had conducted with CS-1.



15. According to CS-1 and the audio-video recordings, after BELL demanded CS-1's wallet, CS-1 handed BELL the \$1,000 in pre-recorded government funds that law enforcement previously provided to CS-1 for the purpose of purchasing the pistol from BELL. In addition, according to CS-1 and the audio-video recording,

BELL searched certain compartments inside of CS-1's vehicle to locate additional cash or items to steal from CS-1. As BELL conducted this search, BELL continued to point the firearm at CS-1.

16. As soon as law enforcement learned that BELL was robbing CS-1, law enforcement converged on CS-1's vehicle. BELL exited the vehicle and ran away from law enforcement, ignoring law enforcement's verbal commands to stop. Law enforcement pursued BELL on foot.

17. As law enforcement was attempting to apprehend BELL, BELL fell to the ground. As he fell, law enforcement observed BELL drop a firearm. BELL then got up from the ground and continued to run from law enforcement. Law enforcement retrieved the firearm that BELL dropped and determined it was a loaded Glock Model 21, 45 caliber semi-automatic pistol, bearing serial number BKWA019, with an extended magazine attached to the firearm.

18. Law enforcement then arrested BELL. During a search of BELL's person, law enforcement recovered the \$1,000 in pre-recorded government funds that BELL stole from CS-1 during the robbery. Law enforcement also recovered additional currency on BELL's person.

19. Prior to providing \$1,000 in pre-recorded funds to CS-1 so that CS-1 could conduct the transaction with BELL on or about November 12, 2021, law enforcement made a receipt of the currency that was provided to CS-1. The receipt recorded the serial numbers of each bill. Law enforcement compared the serial numbers of the \$1,000 found in BELL's possession to the serial numbers of the pre-

recorded bills and found that the bills recovered from BELL matched the serial numbers of the pre-recorded currency.

## II. CONCLUSION


20. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that on or about November 12, 2021, LINDSEY BELL violated Title 18, United States Code, Sections 2114(a) and 924(c)(1)(A).

FURTHER AFFIANT SAYETH NOT.

*Sean Ahern* 11/15/2021

Sean Ahern  
Special Agent, Bureau of Alcohol, Tobacco,  
Firearms & Explosives

SUBSCRIBED AND SWORN to telephonically on November 15, 2021.

  
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JEFFREY COLE  
United States Magistrate Judge